

EXHIBIT B

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KELLEHER & DUNNE LLP

ATTORNEYS AT LAW

17 BATTERY PLACE

11TH FLOOR

NEW YORK, NY 10004

DENIS P. KELLEHER

JOHN W. DUNNE

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(212) 825-1700
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VIA FACSIMILE

March 27, 2007

AUSA Danya Perry
United States Attorney's Office
Southern District of New York
One Saint Andrews Plaza
New York, N.Y. 10007
Fax No. 212-637-2429

RE: *United States v. Roberto Montgomery, et. al.*
S4 05 Cr. 1067 (KMK)

Dear AUSA Perry:

I am the attorney for Naresh Pitambar ("Pitambar") in the above-referenced matter. Pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), *United States v. Rivas*, 377 F.3d 195 (2d Cir. 2004), and *United States v. Gil*, 297 F.3d 93 (2d Cir. 2002), I immediately demand all exculpatory material, including but not limited to, statements by any witness interviewed by the government or law enforcement that indicated any of the following:¹

1. that the witness knew or had reason to know that Pitambar did not know (or was not told) about the scheme alleged in the indictment; and
2. that the witness knew or had reason to know that Pitambar was not informed that any of the checks given to him by any alleged co-conspirator was a fraudulent check.

Furthermore, pursuant to FRE 702, 703, 705 and 1006 and Rule 16(a)(1)(F) & (G), I immediately demand any and all expert or scientific reports and summary charts you intend to introduce on your direct case.

As always, please call me if you have any questions.

Very truly yours,

Denis P. Kelleher

¹ Please be advised that this demand is continuing.

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P LASERJET FAX

Mar-27-2007 1:03PM

Fax Call Report

Job	Date	Time	Type	Identification	Duration	Pages	Result
150	3/27/2007	1:03:05PM	Send	12126372429	0:31	1	OK

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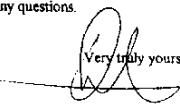
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April 2, 2007

AUSA Danya Perry
United States Attorney's Office
Southern District of New York
One Saint Andrews Plaza
New York, N.Y. 10007
Fax No. 212-637-2429

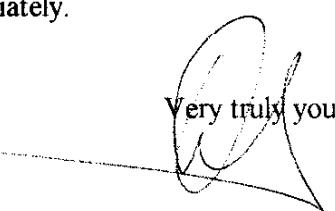
RE: *United States v. Roberto Montgomery, et. al.*
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Dear AUSA Perry:

I am the attorney for Naresh Pitambar ("Pitambar") in the above-referenced matter. Based upon my review of the 3500 material provided on March 30, 2007, I have determined the following documents are missing:

1. the types reports of Natasha Singh's all of her proffer meetings¹;
2. the transcripts in your possession for 3512O-3512S²;
3. Natasha Singh's INS application that is the subject of Count 14 of the information she pled guilty;
4. Natasha Singh's proffer notes from March 5, 2007;
5. Grand Jury testimony of any witness the government intends on calling on trial³; and
6. Jeffrey Blue's cooperation agreement and information.

Please provide these documents immediately.


Very truly yours,

Denis P. Kelleher

¹ Either the FBI 302 or equivalent from the law enforcement agency conducting the interview.

² 3512P is a blank tape with no recording on it.

³ The only grand jury provided is Willie Robinson.

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HP LASERJET FAX



Apr-2-2007 12:47PM

Fax Call Report

Job	Date	Time	Type	Identification	Duration	Pages	Result
183	4/ 2/2007	12:46:46PM	Send	12126372429	0:30	1	OK

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April 2, 2007

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 Southern District of New York
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April 11, 2007

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Fax No. 212-637-2429

RE: *United States v. Roberto Montgomery, et. al.*
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Dear AUSA Perry:

I am the attorney for Naresh Pitambar ("Pitambar") in the above-referenced matter. Pursuant to 18 USC 3500, I demand the following documents:

1. Notes from March 5, 2007 to present of all meetings with Natasha Singh;
2. Grand Jury testimony of any witness the government intends on calling on trial besides Willie Robinson; and
3. all letters provided to Natasha Singh from Frank Rodriguez.

Please provide these documents immediately.

Very truly yours,

Denis P. Kelleher

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P LASERJET FAX

Apr-11-2007 8:29AM



Fax Call Report

Job	Date	Time	Type	Identification	Duration	Pages	Result
258	4/11/2007	8:29:15AM	Send	12126372429	0:28	1	OK

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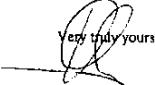
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